

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
DEBRA G. SNOW	:	VIOLATION: 18 U.S.C. § 1343 (wire fraud - 3 counts) 26 U.S.C. § 7206(1) (willfully filing false federal income tax returns - 3 counts)

INFORMATION

COUNTS ONE THROUGH THREE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times relevant to this information:

1. From approximately 2002 through approximately March 2007, defendant DEBRA G. SNOW was employed as the company controller of JRNA Inc., doing business as "Unclaimed Freight" ("JRNA"), a discount furniture retailer with stores located in Pennsylvania and New Jersey, including a facility located at 2260 Industrial Drive, Bethlehem, Pennsylvania. Her duties and responsibilities included accounting, supervising office personnel, and preparing financial statements for JRNA. In addition, defendant DEBRA G. SNOW was authorized to use corporate credit/debit cards, and sign corporate checks written on a corporate checking account for the purpose of paying vendors who provided materials or services.

THE SCHEME

2. From in or about February 2003, through in or about March 2007, defendant

DEBRA G. SNOW

devised and intended to devise a scheme to defraud JRNA Inc., and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

MANNER AND MEANS

It was part of the scheme that:

3. Between in or about February 2003 and in or about March 2007, while employed at JRNA, defendant DEBRA G. SNOW, without authorization from her employer, charged personal expenses on multiple occasions using the corporate credit/debit cards against her employer's corporate checking accounts, and wired funds from a corporate account to her personal accounts.

4. Defendant DEBRA G. SNOW embezzled corporate funds for her own personal use by using the corporate credit and debit cards, in order to pay personal expenses such as auto insurance, and expenses for an unrelated business she was associated with, without the knowledge or authorization of her employer.

5. Between in or about February 2003 and in or about March 2007, as a result of her fraudulent scheme, defendant DEBRA G. SNOW defrauded JRNA of money amounting to a total loss of approximately \$310,940.00.

6. On or about each of the dates set forth below, each date constituting a separate count, in the Eastern District of Pennsylvania and elsewhere, defendant

DEBRA G. SNOW,

for the purpose of executing the scheme described above, caused to be transmitted by means of wire communications in interstate commerce, signals and sounds, that is, used a credit card over the internet and/or a debit card which caused a wire communication, i.e. a wire transfer of funds, from a financial institution which affected interstate commerce:

<u>COUNT</u>	<u>DATE</u>	<u>AMOUNT</u>	<u>CHECKING ACCOUNT</u>
1	1/10/06	\$1,191.00	Wachovia Business Checking Acct No. XXX3630 JRNA Inc. Wire Transfer from North Carolina to Ohio
2	7/31/06	\$44,238.63	Lafayette Ambassador Business Checking Acct No. XXX6661 JRNA Inc. Wire Transfer from Pennsylvania to New York
3	3/26/07	\$601.50	Wachovia Business Checking Acct No. XXX3630 JRNA Inc. Wire Transfer from North Carolina to New York

All in violation of Title 18, United States Code, Section 1343.

COUNT FOUR

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about April 15, 2005, in the Eastern District of Pennsylvania, defendant

DEBRA G. SNOW

willfully made and subscribed a United States income tax return, Form 1040, for the calendar year 2004, which was verified by a written declaration that it was made under the penalty of perjury and filed with the Internal Revenue Service, which defendant DEBRA G. SNOW did not believe to be true and correct as to every material matter, in that the individual income tax return reported taxable income of approximately \$26,570, when in fact, as defendant DEBRA G. SNOW well knew, she failed to report additional taxable income of approximately \$54,965.

In violation of Title 26, United States Code, Section 7206(1).

COUNT FIVE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about April 15, 2006, in the Eastern District of Pennsylvania, defendant

DEBRA G. SNOW

willfully made and subscribed a United States income tax return, Form 1040, for the calendar year 2005, which was verified by a written declaration that it was made under the penalty of perjury and filed with the Internal Revenue Service, which defendant DEBRA G. SNOW did not believe to be true and correct as to every material matter, in that the individual income tax return reported taxable income of approximately \$11,885, when in fact, as defendant DEBRA G. SNOW well knew, she failed to report additional taxable income of approximately \$62,537.

In violation of Title 26, United States Code, Section 7206(1).

COUNT SIX

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about April 15, 2007, in the Eastern District of Pennsylvania, defendant

DEBRA G. SNOW

willfully made and subscribed a United States income tax return, Form 1040, for the calendar year 2006, which was verified by a written declaration that it was made under the penalty of perjury and filed with the Internal Revenue Service, which defendant DEBRA G. SNOW did not believe to be true and correct as to every material matter, in that the individual income tax return reported taxable income of approximately \$4,156, when in fact, as defendant DEBRA G. SNOW well knew, she failed to report additional taxable income of approximately \$208,761.

In violation of Title 26, United States Code, Section 7206(1).

PATRICK L. MEEHAN
United States Attorney